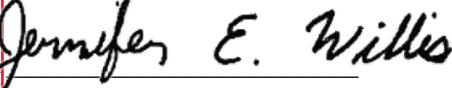


CUTI HECKER

Both requests are GRANTED. The Parties shall file briefs on the public docket with Social Security numbers, dates of birth, and relevant medical records redacted. The Parties shall then submit unredacted versions under seal as necessary.

SO ORDERED.



Hon. Jennifer E. Willis
United States District Judge
500 Pearl Street
New York, NY 10007

March 14, 2024

Re: *Miller v. City of New York*, 21-cv-02616-PKC-JW

Dear Judge Willis:

Together with Alexander Reinert, we are Class Counsel in this certified class action. We write pursuant to Your Honor's Individual Rule II.E to request permission to file certain information regarding Class Members' medical records, and the medical records themselves, under seal. The City makes the same request regarding Class Members' Social Security numbers and dates of birth. Each side consents to the other side's request.

As the Court is aware, the parties are filing opening briefs regarding disputed Challenges this Friday, March 15, 2024 (with Class Counsel addressing Class Member Challenges and the City addressing City Challenges). By necessity, the briefing regarding certain Class Member Challenges requires discussion of the Class Members' confidential medical information. It also will require reference to confidential medical records, which we intend to submit as exhibits in support of the Class Member Challenges. The Stipulation of Settlement in this case requires that all medical information disclosed as part of the Challenge process be treated as confidential. *See* Stipulation ¶ 133 (ECF 108, Att. 1). For this reason, and because medical information is inherently sensitive and private, we request the Court's permission to file the relevant medical records and an unredacted brief under seal, with a redacted brief to be filed on the public docket. Defendants consent to this request.

Similarly, the City's forthcoming submission in support of its City Challenges will rely on documents that reveal certain Class Members' Social Security numbers and dates of birth. The City seeks leave to redact those documents in its public filing, and to submit the unredacted records under seal as necessary. We consent to this request.

Each of these requests would apply to all of the parties' submissions (opening, opposition, and reply). We appreciate the Court's attention to this matter.

Respectfully submitted,



Eric Hecker

cc: All Counsel of Record